

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

**DEFENDANT GOOGLE LLC'S REPLY TO PLAINTIFF'S OPPOSITION  
TO MOTION FOR PROTECTIVE ORDER**

Defendant Google LLC’s (“Google”) Motion for Protective Order (ECF No. 249) requested that the Court clarify and limit the scope of testimony Google was to provide in response to Plaintiff Singular Computing LLC’s (“Singular”) Notice of Deposition of Google LLC pursuant to Fed. R. Civ. P. 30(b)(6), dated May 5, 2021. Following the filing of Google’s Motion for Protective Order, the Court issued an order (ECF No. 260) clarifying the scope of testimony Google was to provide in response to Singular’s Rule 30(b)(6) deposition notice; the parties completed the depositions of all individuals designated to testify on Google’s behalf regarding the topics in Singular’s Rule 30(b)(6) deposition notice; and the parties attended a status conference with the Court on August 3, 2021, regarding, among other things, the testimony that Google’s Rule 30(b)(6) designees had provided. At the August 3 status conference, Singular identified no issues with the testimony that Google’s designees had provided, including the deposition testimony of Kamran Shafiei, but requested until the end of the week of August 2, 2021, to review the transcript of Dr. Nishant Patil to identify any related issues with his Rule 30(b)(6) testimony. As of the date of the filing of this brief, Singular has raised no additional concerns. Given the representations Singular made at the August 3, 2021 status conference and the fact that Singular did not subsequently identify any issues with respect to the testimony provided by Google’s Rule 30(b)(6) designees, Google believes that the Court can deem Google’s Motion for Protective Order moot.

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Respectfully submitted,

Dated: August 9, 2021

By: /s/ Matthias Kamber

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**CERTIFICATE OF SERVICE**

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed  
Nathan R. Speed